

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

vs.

Litchain Corp. and Gaffney Board of Public  
Works,

Defendants.

Gaffney Board of Public Works,

Defendant/Counter and  
Cross-Claimant,

vs.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Counterclaim Defendant,

and

Litchain Corp.,

Crossclaim Defendant.

Civil Action No. 7:23-cv-01427-TMC

**PLAINTIFF BLOCKQUARRY CORP.  
F/K/A ISW HOLDINGS, INC.'S  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO BITMAIN  
TECHNOLOGIES GEORGIA  
LIMITED'S MOTION TO  
INTERVENE**

Pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Civil Rule 6.01 (D.S.C.), Plaintiff Blockquarry Corp. f/k/a ISW Holdings, Inc. ("Blockquarry") requests the Court enter an order permitting a twenty-one (21) day extension of the deadline for Blockquarry to file a response in opposition to Bitmain Technologies Georgia Limited's ("Bitmain") Motion to Intervene, filed on March 27, 2024 (ECF No. 106). The current deadline is April 10, 2024. This extension would give Blockquarry until May 1, 2024 to file its response.

Blockquarry seeks this extension because undersigned counsel was retained to represent Blockquarry in this matter on Monday, April 8, 2024, and the current deadline to respond to Bitmain's Motion to Intervene is Wednesday, April 10, 2024. This extension will provide Blockquarry's new counsel sufficient time to become acquainted with facts and procedural posture of this case and perform adequate research to prepare its response to Bitmain's Motion to Intervene. This deadline has not been previously extended, and the requested extension will not affect other deadlines.

Pursuant to Local Civil Rule 7.02 (D.S.C.), counsel for Blockquarry consulted with counsel for Bitmain, as well as counsel for Defendant Gaffney Board of Public Works ("Gaffney BPW") and Intervenor Crypto Infiniti LLC ("Crypto Infiniti") on April 8, 2024. Counsel for Gaffney BPW and Crypto Infiniti consented to this motion. Counsel for Bitmain did not consent to this motion.<sup>1</sup>

WHEREFORE, Blockquarry respectfully requests that the Court enter an order extending the deadline for Blockquarry to respond to Bitmain's Motion to Intervene until May 1, 2024.

*[signature page follows]*

---

<sup>1</sup> Undersigned counsel has notified counsel for Bitmain that a conflict exists with Nelson Mullins Riley & Scarborough LLP's representation of Bitmain under Rules 1.09(a) and 1.10 of the South Carolina Rules of Professional Conduct. Blockquarry will file a Motion to Disqualify Bitmain's counsel on April 9, 2024 if Bitmain's counsel does not promptly withdraw.

Respectfully submitted,

**MAYNARD NEXSEN PC**

*s/ Andrew A. Mathias*

---

Andrew A. Mathias, Fed. ID No. 10166

Konstantine P. Diamaduros, Fed. ID No. 12368

Elizabeth C. Edmondson, Fed. ID No. 13208

MAYNARD NEXSEN PC

104 South Main Street, Suite 900

Greenville, SC 29601

Telephone: (864) 370-2211

[AMathias@maynardnexsen.com](mailto:AMathias@maynardnexsen.com)

[KDiamaduros@maynardnexsen.com](mailto:KDiamaduros@maynardnexsen.com)

[EEdmondson@maynardnexsen.com](mailto:EEdmondson@maynardnexsen.com)

April 8, 2024  
Greenville, South Carolina

*Attorneys for Plaintiff Blockquarry Corp. f/k/a ISW  
Holdings, Inc.*